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CLOSURE SUMMARY REPORT FOR RCRA UNITS 15 AND 35 CLOSED IN ACCORDANCE WITH RCRA UNDER THE RSOP FOR FACILITY COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION ACTIVITIES

U.S. Department of Energy
Rocky Flats Environmental Technology Site
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ADMIN RECORD

IA-A-001554

1.0 PURPOSE

This Summary Report pertains to RCRA closure activities for the RCRA Units 15 and 35 that comprised the 904 Pad. The 904 Pad included 23 cargo containers, Tents 8-11, the 904 asphalt pad, Tent 7 and the associated 902 asphalt pad, RCRA Unit 35 a permacon inside of Tent 10, and a permacon inside of Tent 11 used for chemical repack operations. This report is a requirement as annotated in the RSOP for Component Removal, Size Reduction, and Decontamination Activities Notification Letter (02-RF-02229) and contains a description of major closure activities and any deviations from those stated in the RSOP and other relevant information.

2.0 DESCRIPTION OF MAJOR CLOSURE ACTIVITIES

Closure activities for Tent 7 and the 902 pad were conducted under the *Removal of Tents 7*, 8, and 9 Demolition Plan. As agreed to in a Contact Record dated 10/8/2002, between Steve Nesta, K-H and David Kruchek, CDPHE, Tent 7 and the associated asphalt pad was removed prior to the RSOP being approved since it met Clean Closure Option 1 as defined in Section 5.1.1 of the RSOP for Component Removal, Size Reduction, and Decontamination Activities. The entire tent structure and asphalt pad was disposed of as non-routine sanitary waste. Following are the waste amounts for the tent structure and asphalt pad.

Tent 7 structure = 80 cubic yards (≈15 tons) sanitary waste

902 asphalt pad = 580 cubic yards (≈532 tons) sanitary waste

After approval of the RSOP Notification letter by CDPHE, on November 22, 2002, the closure of Tents 8 and 9 occurred under the previously mentioned Demolition Plan. Prior to demolition the asphalt pad was rinsed, the rinsate was collected and sampled to confirm the pad was clean and could be released as sanitary waste. All analytical data was supplied to CDPHE for review. After showing the asphalt was clean, demolition of Tent 8 and 9 structures commenced. Following are the waste amounts for the tent structures.

Tent 8 structure = 180 cubic yards (≈25.5 tons) sanitary waste

Tent 9 structure = 200 cubic yards (\approx 35.5 tons) sanitary waste

The secondary containment pans and rollers inside of the cargo containers were also rinsed, the rinsate was collected and sampled to confirm the containment pans and rollers were clean and could be released as sanitary waste. All analytical data was supplied to CDPHE for review. The cargo containers, were released through the Waste Release Evaluation process and sold by PU&D. Following are the waste amounts:

Containment pans and rollers = 80 cubic yards (≈29 tons) sanitary waste

Both RCRA Unit 35 and the permacon in Tent 11 were closed under IWCP #T0110940. RCRA Unit 35 was disposed of as Low Level Mixed waste. The permacon in Tent 11 was disposed of as Low Level waste. Following are the waste amounts for RCRA Unit 35 and Tent 11 permacon.

RCRA Unit 35 = 88 cubic yards (≈ 14.5 tons) low level mixed waste

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Tent 11 Permacon = 132 cubic yards (≈18 tons) low level waste

After the permacons were removed from Tents 10 and 11 the asphalt pad was rinsed, the rinsate was collected and sampled to confirm the pad was clean and could be released as sanitary waste.

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All analytical data was supplied to CDPHE for review. After showing the asphalt was clean, demolition of Tents 10 and 11 was completed under Removal of Tents 10 and 11 Demolition Plan. Following are the waste amounts for the tents.

Tent 10 and 11 = 770 cubic yards (≈ 142 tons) sanitary waste

Once the tent structures were removed the asphalt pad was turned over to Environmental Remediation for removal. This removal action was completed under the RISS-ER Field Implementation Plan (14393-FIP-01) and the ER Health and Safety Plan (14393-HASP-01). The majority of the 904 pad was removed and disposed of as non-routine sanitary waste. The five-foot wide length along the easternmost edge of the pad was removed and disposed of as hazardous waste. Following are the waste amounts for the 904-asphalt pad.

Non-hazardous asphalt = 2720 cubic yards (≈2511 tons) sanitary waste

Hazardous asphalt = 100 cubic yards (≈99.4 tons) hazardous waste

3.0 SUMMARY

Additionally, it should be noted that the propane system in Tents 10 and 11 were closed and appropriately removed. The electrical system was disconnected at the nearest utility pole. The requirements stated in the RSOP notification letter for RCRA closure have been fulfilled. This Closure Summary Report will serve as notice to update the Site's Master List of RCRA units and submit a permit modification to remove the units from the RCRA Part A and Part B Permit.

